

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DR. DOUGLASS SCHOTTENSTEIN, M.D., THOMPSON
REAL ESTATE, LLC, and SCHOTTENSTEIN PAIN
AND NEURO, PLLC D/B/A NY SPINE MEDICINE,

22-cv-01197 (DLC)

Plaintiffs,

-against-

**DECLARATION IN
RESPONSE**

DEREK LEE, PEARL CHAN, and JOHN AND JANE
DOES 1-10,

Defendants.

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JEFFREY CHABROWE, pursuant to 28 U.S.C. § 1746, hereby declares under penalty
of perjury that the forgoing is true and correct as follows:

1. I am an attorney admitted to practice law in the Southern District of New York, and I
represent the Defendants in this matter. As such, I am fully familiar with the facts
and circumstances below.
2. I submit this Declaration in Response on behalf of Defendants Derek Lee and Pearl
Chan in response to the Court's October 2, 2023, Order to Show Cause.
3. JAMS Protective Order, **Exhibit A**.
4. Tables Showing Deposition Excerpts Filed on Both 8/14/2023 and 9/15/2023,
Exhibit B.
5. Table Showing Defendants' Reckless Filings, **Exhibit C**.
6. Chabrowe Deposition of Facts, **Exhibit D**.
7. Table Showing Total Deposition Excerpts for Lee and Chan filed 9/15/2023, **Exhibit
E**.

Dated: New York, New York
October 10, 2023

Respectfully Submitted,

The Law Office of Jeffrey Chabrowe, P.C.
By:

/s_____
Jeffrey Chabrowe, Esq.
The Law Office of Jeffery Chabrowe, P.C.
Attorney(s) for the Defendants
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